

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY LOWE,

LAUREN LOWE,

GREATER WYNNEWOOD EXOTIC ANIMAL
PARK, LLC, and

TIGER KING, LLC,

Defendants.

Case No. 6:20-cv-00423-JFH

**UNITED STATES' NOTICE OF DISMISSAL OF CLAIMS AGAINST JEFFREY AND
LAUREN LOWE**

Pursuant to Federal Rule of Civil Procedure 41(a)(1), Plaintiff the United States hereby provides notice of its voluntary dismissal of the claims raised in the Complaint against Defendants Jeffrey Lowe and Lauren Lowe (“the Lowes”).

On November 19, 2020, the United States filed the Complaint in this civil enforcement action, raising claims under the Endangered Species Act and Animal Welfare Act against the Lowes, Greater Wynnewood Exotic Animal Park, LLC, and Tiger King, LLC. Dkt. 2. On December 23, 2021, the Court approved and entered a Consent Decree between the United States and the Lowes resolving the claims raised against the Lowes in this action. Dkt. 156. In the Consent Decree, the United States and the Lowes agreed that the United States would dismiss all claims against the Lowes within seven days of the Court’s entry of the Consent Decree. Dkt. 155 at 7. In accordance with the Consent Decree, the Court ordered the United States to move to

dismiss the claims against the Lowes by January 6, 2021. Dkt. 156. Also on December 23, 2021, the Court granted the United States' motion for default judgment and issued a declaratory and default judgment against Defendants Greater Wynnewood Exotic Animal Park, LLC, and Tiger King, LLC, for failure to file a timely answer to the Complaint and failure to obtain counsel. Dkt. 157, 158.

Pursuant to Federal Rule of Civil Procedure 41(a)(1), a plaintiff may voluntarily dismiss claims without a court order if the defendant has not yet served an answer or motion for summary judgment or if the parties have signed a stipulation of dismissal. In this litigation, the Lowes have never filed an answer or a motion for summary judgment. Therefore, this notice serves to voluntarily dismiss the claims in the Complaint as raised against the Lowes.¹ The remainder of the Complaint has been resolved by the Court's entry of a default judgment against Defendants Greater Wynnewood Exotic Animal Park, LLC, and Tiger King, LLC.

DATED: December 29, 2021

Respectfully Submitted,

TODD KIM
Assistant Attorney General
Environment and Natural Resources Division

/s/ Devon Lea Flanagan

DEVON LEA FLANAGAN
Trial Attorney
BRIENA STRIPPOLI
Trial Attorney
MARY HOLLINGSWORTH
Senior Trial Attorney
United States Department of Justice
Environment & Natural Resources Division

¹ Should the Court find a motion to dismiss necessary in these circumstances, *see* Dkt. 156, the United States alternatively moves to dismiss the claims against the Lowes pursuant to Federal Rule of Civil Procedure 41(a)(2). As expressed in the Consent Decree, the Lowes do not oppose the United States' dismissal of these claims.

Wildlife & Marine Resources Section
P.O. Box 7611, Ben Franklin Station
Washington, D.C. 20044-7611
Devon.Flanagan@usdoj.gov | 202-305-0201
Briena.Strippoli@usdoj.gov | 202-598-0412
Mary.Hollingsworth@usdoj.gov | 202-598-1043
Fax: 202-305-0275

CHRISTOPHER J. WILSON
Acting United States Attorney
SUSAN BRANDON, Civil Chief
United States Attorney's Office
Eastern District of Oklahoma
520 Denison Avenue
Muskogee, OK 74401

Attorneys for the United States of America